

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

ALL ACTIONS

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) MDL Docket No. 2196
) Index No. 10-MD-2196 (JZ)
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**PLAINTIFFS' NOTICE OF MOTION FOR ISSUANCE OF LETTERS ROGATORY TO
MICHAEL CALDERONI, ANTHONY DACOSTA, DOUG DOLPHIN, AND AL ZINN**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 4 and 26; the All Writs Act, 28 U.S.C. §§1651, 1781; and Article 5(j), Vienna Convention on Consular Relations, April 24, 1963, Direct Purchaser (Class) Plaintiffs, Indirect Purchaser (Class) Plaintiffs, and Direct Action Plaintiffs (collectively, "Plaintiffs") move for an order issuing Letters Rogatory to Michael Calderoni, Anthony Dacosta, Doug Dolphin, and Al Zinn in Canada. Plaintiffs' motion is based upon Plaintiffs' memorandum of law in support of their motion and the exhibits attached thereto, filed concurrently with this Notice of Motion and Motion.

DATED: November 18, 2013

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2013, in accordance with Paragraphs 5 and 9 of the Initial Case Management Order entered January 20, 2011, the foregoing **NOTICE OF MOTION FOR ISSUANCE OF LETTERS ROGATORY TO MICHAEL CALDERONI, ANTHONY DACOSTA, DOUG DOLPHIN, AND AL ZINN**, and exhibits thereto, were filed electronically using the Court's ECF system, which will send notification of such filing to counsel of record.

/s/ Adam B. Wolfson

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